

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
Plaintiff	)	
	)	
v.	)	No. 21 CR 105-3
	)	Honorable Judge Blakey
DARION LINDSEY	)	
Defendant	)	

DARION LINDSEY’S RESPONSE TO GOVERNMENT’S SENTENCING MEMORANDUM

NOW COMES the defendant, Darion Lindsey, by his attorney, Amir Mohabbat, and submits this response as follows:

The Government’s sentencing memorandum argues in support of a guidelines range sentence seemingly because the offense level and the criminal history score arrive at the guideline range. Such a circular argument fails to adequately filter the circumstances of Mr. Lindsey’s life and the offense through the 18 U.S.C. §3553(a) sentencing factors; Mr. Lindsey’s sentencing memorandum does. Rita v. United States, 511 U.S. 1181 (2007) explains that district judges are required “to filter the Guidelines’ general advice through 3553(a)’s list of factors”. Booker, 543 U.S. at 259-60.

As stated by Mr. Lindsey and the PSR, Mr. Lindsey grew up as a neglected child and in poverty, surrounded by drugs and violence. He has remorse for his illegal conduct that is not contested. Mr. Lindsey prays that this court impose a sentence of time served in prison, followed by 2 years of supervised release, \$20,987.00 in restitution, and the imposition of a \$200 special assessment.

Dated this 18<sup>th</sup> day of April, 2024.

Respectfully submitted,

/s/ Amir Mohabbat

Amir Mohabbat  
The Chicagoland & Suburban Law Firm, P.C.  
248 S. Marion St., #104  
Oak Park, Illinois 60302

Attorney for Defendant.

#### PROOF OF SERVICE

I, Amir Mohabbat, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

April 18, 2024

/s/ Amir Mohabbat